

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**SWISSDIGITAL USA CO., LTD.**

**Plaintiff,**

**v.**

**WENGER S.A.**

**Defendant.**

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**Civil Action No. 6:21-cv-453-ADA**

**JURY TRIAL DEMANDED**

**DECLARATION OF FRANCES H. STEPHENSON IN SUPPORT OF SWISSDIGITAL  
USA CO., LTD.'S RESPONSE IN OPPOSITION TO WENGER S.A.'S MOTION TO  
TRANSFER PURSUANT TO U.S.C. § 1404(a)**

I, Frances H. Stephenson, declare:

1. I am over twenty-one years of age and have personal knowledge of the following facts or access to information and/or records allowing me to confirm these facts.

2. I am a member of the law firm of Keyhani LLC and represent Plaintiff Swissdigital USA Co., LTD. ("Plaintiff" or "Swissdigital").

3. I submit this declaration in support of Swissdigital's Response in Opposition to Wenger S.A.'s Motion to Transfer.

4. Attached hereto as Exhibit A is a true and correct copy of a complaint in the case *Wenger S.A. v. Galaxy Brands LLC et al.*, 1:20-cv-01107 (S.D.N.Y.) (Dkt. #7).

5. Attached hereto as Exhibit B is a true and correct copy of Wenger S.A.'s Memorandum of Law in Support of its Combined Motion for Preliminary Injunction Against Olivet International, Inc., and For Lift of Stay of Case in the case *Wenger S.A. v. Galaxy Brands LLC et al.*, 1:20-cv-01107 (S.D.N.Y.) (Dkt. #96-5).

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Executed on March 28, 2022

/s/ Frances H. Stephenson  
Frances H. Stephenson